

**P O R T E R | S C O T T**

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Attorneys for Defendants CITY OF ROSEVILLE, OFFICER DEAN RIANO, OFFICER SETH ADDINGTON, and  
SERGEANT CHRISTOPHER CIAMPA

*Exempt from filing fee pursuant to Government Code section 6103*

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA**

KATHERINE ROBLES, an individual; and H.R.,  
by and through his guardian ad litem Katherine  
Robles;

Plaintiffs,

vs.

CITY OF ROSEVILLE, a Municipal  
Corporation; OFFICER DEAN RIANO, in his  
official and personal capacity; OFFICER SETH  
ADDINGTON, in his official and personal  
capacity; SERGEANT CHRISTOPHER  
CLAMPA, in his official and personal capacity;  
and DOES 1-20, inclusive, individually, jointly  
and severally,

Defendants. /

**Case No.: 2:22-cv-00085-DC-SCR**

**STIPULATION TO CONTINUE DEADLINES IN  
SCHEDULING ORDER AND PROPOSED  
ORDER**

Complaint filed: 01/14/2022

Plaintiffs Katherine Robles and H.R. ("Plaintiffs") and Defendants City of Roseville, Dean Riano,  
Seth Addington, and Christopher Ciampa ("Defendants") (Plaintiffs and Defendants jointly referred to as  
the "parties"), by and through their respective counsels of record, hereby stipulate as follows:

1. Plaintiffs disclosed Scott DeFoe as an expert witness.

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2. After obtaining availability, Defendants noticed Scott DeFoe's deposition. Mr. DeFoe requested the deposition be rescheduled for the morning of March 24, 2025. Although Defendants' counsel had conflicts that afternoon, Defendants' counsel agreed to reschedule the deposition because counsel initially anticipated Mr. DeFoe's deposition would be three hours or less.
3. After preparing for Mr. DeFoe's deposition, Defendants' counsel believes that Mr. DeFoe's deposition will likely last longer than three hours. Thus, the parties agreed to reschedule Mr. DeFoe's deposition for a date that it can be completed in one day.
4. Additionally, on the morning of March 24, 2025, Defendants' counsel's son became ill and had to stay home from school, thus requiring Defendants' counsel to be home with his son and further complicating completing Mr. DeFoe's deposition that morning.
5. The next available date for Mr. DeFoe's deposition that works for the parties and Mr. DeFoe is April 21, 2025. This is after the present discovery cut off date of April 11, 2025.
6. The parties stipulate to continue the expert discovery deadline to April 21, 2025, to allow the completion of Mr. DeFoe's deposition that day.

**IT IS SO STIPULATED.**

Dated: March 24, 2025

PORTER SCOTT  
A PROFESSIONAL CORPORATION

By: /s/ William E. Camy  
William E. Camy  
Megan N. Boelter  
Attorney for Defendants

Dated: March 24, 2025

THE LAW OFFICES OF DALE K. GALIPO

By: /s/ Benjamin S. Levine  
Benjamin S. Levine  
Dale K. Galipo  
Attorneys for Plaintiffs

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**[PROPOSED] ORDER**

Having reviewed the foregoing stipulation, and good cause appearing, the Court hereby amends its prior scheduling orders as follows:

1. All expert discovery shall be completed by April 21, 2025.
2. All other dates remain unchanged.

**IT IS SO ORDERED.**

Date:

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JUDGE DENA COGGINS

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